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UTAH DIVISION OF SOLID & HAZARDOUS WASTE

CLASS 2 MODIFICATION

TO THE

TOCDF RCRA PERMIT

REQUEST NUMBER:

TOCDF-MDM-02-0836

REQUEST TITLE:

Froth Collection System for MDMs

EPA ID:

UT 5210090002

TO:

UTAH DIVISION OF SOLID AND HAZARDOUS WASTE

1460 WEST 288 NORTH

P. O. BOX 144880

SALT LAKE CITY, UTAH 84114-4880

TITLE:

FROTH COLLECTION SYSTEM FOR MDMS

CLASS:

Class 2 Modification - 40 CFR 270.42 (d)

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A: DESCRIPTION OF CHANGES

REQUEST TO CLASSIFY AS A CLASS 2 MODIFICATION

In accordance with 40 CFR 270.42(d)(1), the Tooele Chemical Agent Disposal Facility (TOCDF) requests a determination that this modification should be reviewed and approved as a Class 2 Modification Request to the TOCDF Resource Conservation and Recovery Act (RCRA) Permit. This modification request contains in <u>Section E</u> the information necessary to justify the requested classification.

SCOPE OF THIS MODIFICATION REQUEST

This scope of this modification request includes only the installation of the newly-designed Froth Collection System onto the existing Multipurpose Demilitarization Machines (MDMs)—which are currently-permitted 40 CFR 264 Subpart X "Miscellaneous Treatment Units". The treatment of 4.2-inch Mustard mortars at the MDMs and the Metal Parts Furnace (MPF) is <u>not</u> within the Baseline Mustard Tons campaign and will be the subject of a later Class 3 RCRA modification request. This Froth Collection System modification is being requested now in order to install the necessary hardware before the Mustard Baseline campaign begins, thereby taking advantage of the recently decontaminated MPB.

BACKGROUND

TOCDF has completed destruction of warfare munitions containing GB (Sarin) and VX. TOCDF is now scheduled to begin the destruction of munitions and containers filled with the chemical warfare agents designated as H, HD and HT (collectively referred to as "Mustard" blister agent). The Mustard "campaign" is the third and final agent demilitarization campaign TOCDF is to undertake.

The DCD chemical weapons stockpile includes approximately 63,500 4.2-inch mortar rounds. Experience at the Johnston Island JACADS has shown that some of the mustard-containing mortars may have experienced age-related degradation resulting in a susceptibility to effervescence when the agent cavity is breached. Such effervescing munitions at JACADS have been described as "champaign mortars" in reference to their effervescent or "frothing" tendency when the burster well was removed. Previously-processed GB and VX-containing projectiles at TOCDF did not exhibit the "frothing" tendency that is anticipated with the upcoming Mustard mortars.

The current design configuration of the MDM Pull and Drain station includes drip pans in order to limit agent contamination of the machinery and other surfaces. The drip pans include small drains and suction lines connected directly to the Agent Collection system piping at the suction side of the agent transfer pump. However, the Pull and Drain Station, as currently configured, would not be able to limit agent contamination

that would result from a frothing agent that might run down the sides of the mortar and onto machinery and equipment surfaces.

In an effort to minimize frothing-related agent contamination of machinery and equipment, a "froth collection system" was designed and tested at the Chemical Demilitarization Training Facility (CDTF) in Edgewood, Maryland. The froth-collection system design was based on operational experience gained at JACADS.

Current Design Operation

Before being drained at the MDMs, the 4.2-inch mortars will have their burster/fuze assemblies removed in the Explosive Containment Room (ECR). After exiting the ECR, the mortars will be oriented vertically upright and transferred to the Munitions Processing Bay (MPB) where they will be placed on one of three Multi-Purpose Demilitarization Machines (MDMs). In order to access the agent in the mortar's agent cavity, the MDM's Pull and Drain Station machinery will raise up so that the mortar's nose is in contact with the stop plate prior to removal of the burster well. As was experienced at JACADS, as soon as the burster well was unseated, the agent cavity became exposed to atmospheric pressure, allowing dissolved gases in the liquid agent to effervesce, frothing liquid agent upward and out of the mortar.

Problem with Current Design Operation

Although Mustard 4.2-inch mortars have never been processed at the TOCDF's MDMs, it is anticipated that the same effervescing or frothing problem will be encountered as was experienced at JACADS. The problems experienced at JACADS, if not accounted for through design changes, is expected to occur at TOCDF.

Modified MDM Configuration Objectives

The modified Pull and Drain Station is designed to:

- 1) Minimize the escape of frothed agent from the ACS system to the MPB's room's sumps and the SDS system
- 2) Minimize liquid agent contamination of the mortar's outer surface, machinery, equipment, room surfaces, and LSS air hoses
- 3) Reduce airborne agent concentrations in the MPB HVAC flow that would result from increased liquid Mustard contamination.

MDM Mortar Froth Collection System Description

The MDM froth collection system consists of six key elements:

1) A modified stop plate

The mortar is raised by the lift cylinder until it is firmly in contact with the stop plate, which holds the mortar's body down while the burster well is removed upward. The existing stop plate will be replaced with a new stop plate with a radial hole bored and tapped to provide a suction pathway from the inner hole that immediately surrounds the burster well press fit. The radial hole thus is at the location where the froth will begin to exit the mortar. To accommodate the radial hole, the new stop plate will be made thicker than the previous stop plate.

2) A froth dam

The froth dam is an open-ended canister facing upward that will serve as a temporary chamber accumulating froth until the suction is capable of drawing the froth away into the agent collection system.

3) A froth shield

The froth shield serves to redirect froth ejected out of the mortar downward into the froth dam.

4) Frame spacer plates

Due to the additional thickness of the stop plate, the entire pull and drain framework will need to be raised an additional 1-3/8" to restore the mortar's overhead clearance.

5) A modified drip pan cylinder hanger bracket

Because the existing drip pan hydraulic cylinder is mounted to the pull and drain framework, which will be raised, a lengthened cylinder mounting bracket will be required to account for the modified overall dimensions.

6) An air actuated ball valve

Tubing will be attached to the modified stop plate's radial hole running to the agent pump suction piping in an identical manner as the drip pans' drain tubing. Because the suction will be activated at key steps in the pull and drain sequence, an air actuated ball valve will be installed within the suction tubing. A solenoid valve will control actuation air (instrument air) to the ball valve.

PERMIT WORDING CHANGES

Attachment 14 "Demilitarization Miscellaneous Treatment Units":

Add the froth collection feature to the description of the MDM's pull and drain operation.

Attachment 17

Add the MDM pull and drain stations' agent-containing froth collection system, as well as the existing drip pan piping components to the equipment lists for 40 CFR 264 Subpart BB –"Air Emissions Standards for Equipment Leaks".

B: RCRA PERMIT CHANGE PAGES

CHANGE PAGES IN BODY OF PERMIT:

None

CHANGE PAGES IN ATTACHMENTS OF PERMIT:

Attachment 14, "Demilitarization Miscellaneous Treatment Units"

Page 46

Attachment 17, "Equipment Lists"

Pages 4, 5, 6 and 7

CHANGES TO DRAWINGS IN PERMIT

P&IDs

- 1) TE-1-D-521 Sheet 1 of 1, Agent Collection System PHS-MDM-101
- 2) EG-01-D-521 Sheet 1 of 2, Agent Collection System PHS-MDM-102
- 3) EG-01-D-521 Sheet 2 of 2, Agent Collection System PHS-MDM-103

rotated so that the first munition goes to Station 3 and the second moves to Station 2. Another munition is placed in the Load/Unload Station and the table is rotated again. Eventually, the MDM is operated so that all six stations have a munition (except when the munitions tray does not have enough remaining unprocessed munitions to deliver to the MDM). Stations 2 and 3 do not perform any operations.

- 14.5.2.2.6 Station 4 is normally used as the Bore Station. It is designed to bore out welded or stuck burster wells. This station is not expected to be used very frequently because most of the munition burster wells were assembled with the press fit method. If a munition requires boring, a clamp cylinder extends and holds the munition in place while the boring head (consisting of an appropriately sized spade drill bit) bores vertically down through the top of the munition. The bore head is raised and lowered by a feed cylinder that contains the bore head drill and motor and is mounted on four vertically-mounted bolster rods. As an alternative, this position can also be configured as a Nose Closure Removal/Burster Detection Station, which may be used to process projectiles received at the TOCDF without bursters. At this station, the nose plugs will be removed and the absence of a burster will be confirmed.
- 14.5.2.2.7 Station 5 is the Pull and Drain Station. It is designed to remove the burster well, thus providing access to the agent-filled cavity in the munition, and then to drain the agent from the munition. Upon entering Station 5, the munition is lifted slightly and held in place while the carriage assembly, which contains a collet assembly and pull cylinders, is lowered so that the collet assembly enters the munition. The collet expands to grip the burster well, and the pull cylinders extend to raise the collet assembly and the burster well from the munition. During burster well removal, a suction may be applied at the munition's nose in order to contain within the ACS system froth that may develop.
- 14.5.2.2.8 After the burster well is removed from the munition, the munition is shifted horizontally into the Drain Station position. A drain tube, which consists of a straight, hollow, steel tube, is lowered into the munition, and the ACS removes the agent from the munition. Under normal operations, it is expected that some of the agent will not be removed by this process. After draining the munition, the drain tube is retracted, the munition returns to the Pull Station, and the burster well is placed back in the munition (or, for some munition types, it is dropped into the burster well chute). Station 5 contains a drip pan to collect residual agent that may drip from the burster well and agent drain tube.
- 14.5.2.2.9 Station 6 is the Crimp Station. It is designed to remove the burster well from the munition and crimp it. Crimping the burster well deforms it so that it no longer seats completely in the munition when replaced. The resulting gap between the burster well and the agent cavity allows a more thorough thermal combustion of the agent heel in the MPF. The burster well is removed from the munition by the burster well gripper assembly. The burster well crimp jaw closes around the burster and deforms it. A strip cylinder is used to remove the burster well from the gripper assembly, where it may become stuck during compression.
- 14.5.2.2.10 The munition is rotated to Station 1 after it is drained and the crimped burster well is placed back into the munition (except for those munitions where the burster well is discarded at Station 5). A burster well detector sensor located at Station 1 checks for the presence of a burster well. If a burster well is not detected, the PPM places the munition

Table 17-1: ACS Equipment Subject to 40 CFR 264 Subpart BB Requirements ¹						
Haz Waste Mgmt Unit	Equipment Tag No.	Location ²		Organic Content (wt%)	Physical State	Method of Compliance with the Standards
ACS - drain from BDS	51-1"-V-22	мрв	Valve	> 10%_	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from BDS	SP-159	мрв	Flex connector	> 10%	Liguid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from BDS	ACS-PUMP-115	мрв	Pump	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from BDS	SP-159	мрв	Flex connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from BDS	51-1"-V-23	MPB		> 10% > 10%	Liquid Liquid	R315-8-18 (40 CFR 264.1058 and 1059) R315-8-18 (40 CFR 264.1058 and 1059)
	51-1"-V-24	MPB		> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from BDS	1"-V-23A	MPB	1.01.1	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from BDS	3/4"-V-9020D	MPB		> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from BDS	FV-20	MPB	1 - 1 - 1 - 1	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from BDS	1"-V-26	+		> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	MDM 101 Drain Tube Flex Hose	MPB	Flex Connector Valve	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from MDM	XV-74	MPB		> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	ACS-TANK-108	MPB	Flanged Connections Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1/2"-V-53D	MPB		> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1/2"-V-53E	MPB	Valve (sampling)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-75	MPB	Valve Flanged Connections	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM ACS - drain from MDM	ACS-FILT-105	MPB MPB	Flanged Connection w/ isolation	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from MDM	Flex Hose	мрв	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1 1/2"-V-50	мрв	Valve	> 10%_	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-51	MPB	Valve (w/quick disconnect)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-54	MPB	Valve (w/quick disconnect)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-58	MPB	Check Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-53	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose	MPB	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	ACS-PUMP-105	MPB	Pump	> 10%_	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)

Table 17-1: ACS Equipment Subject to 40 CFR 264 Subpart BB Requirements ¹						
Haz Waste Mgmt Unit	Equipment Tag No.	Location ²	Equipment Type	Organic Content (wt%)	Physical State	Method of Compliance with the Standards
ACS - drain from MDM	Flex Hose	мрв	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-77	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-73B	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from MDM	LIT-73	мрв	Flanged Connection	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-9109	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose (froth collection)	MPB	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-9077	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-9078	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose (burster well drip pan)	MPB	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose (drain tube drip pan)	MPB	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	MDM 102 Drain Tube Flex Hose	MPB	Flex connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-84	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	ACS-TANK-106	мрв	Flanged connections	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1/4"-V-83D	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from MDM	1/4"-V-83E	MPB	Valve (sampling)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-85	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from MDM	ACS-FILT-106	мрв	Flanged connections	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	PI-81	MPB	Flanged Connection w/ isolation valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex hose	MPB	Flex connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1 1/2"-V-74	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-75	мрв	Valve (w/quick disconnect)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-76	мрв	Valve (w/quick disconnect)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-79	мрв	Check Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-77	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	SP-159	MPB	Flex connector	> 10%	Liguid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	ACS-PUMP-106	MPB	Pump	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	SP-159	MPB	Flex connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-87	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)

Table 17-1; ACS Equipment Subject to 40 CFR 264 Subpart BB Requirements ¹						
Haz Waste Mgmt Unit	Equipment Tag No.	Location ²	Equipment Type	Organic Content (wt%)	Physical State	Method of Compliance with the Standards
ACS - drain from MDM	XV-83B	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	LIT-83	мрв	Flanged connection	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-9110	MPB	Valve	> 10%	<u>Liquid</u>	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose (froth collection)	MPB	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-9087	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-9088	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose (burster well drip pan)	мРВ	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose (drain tube drip pan)	MPB	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	MDM 103 Drain Tube Flex Hose	мРВ	Flex connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-94	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	ACS-TANK-107	мРВ	Flanged connections	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1/4"-V-93D	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1/4"-V-93E	MPB	Valve (sampling)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-95	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	ACS-FILT-107	мрв	Flanged connections	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	PI-93	MPB	Flanged Connection w/ isolation valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex hose	мев	Flex connector	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from MDM	1 1/2"-V-90	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-91	MPB	Valve (w/quick disconnect)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-94	MPB	Valve (w/quick disconnect)	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-98	MPB	Check Valve	> 10%	Liguid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	1"-V-93	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	SP-159	мрв	Flex connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	ACS-PUMP-107	MPB	Pump	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	SP-159	мрв	Flex connector	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-97	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-93B	мрв	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	LIT-93	мрв	Flanged connection	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)

Table 17-1: ACS Equipment Subject to 40 CFR 264 Subpart BB Requirements ¹						
Haz Waste Mgmt Unit	Equipment Tag No.	Location ²		Organic Content (wt%)	Physical State	Method of Compliance with the Standards
ACS - drain from MDM	XV-9111	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264,1058 and 1059)
ACS - drain from MDM	Flex Hose (froth collection)	MPB	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS - drain from MDM	XV-9097	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	XV-9098	MPB	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose (burster well drip pan)	мрв	Flex Connector	<u>> 10%</u>	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS - drain from MDM	Flex Hose (drain tube drip pan)	MPB	Flex Connector	> 10%	Liquid	R315-8-18 (40 CFR 264,1058 and 1059)
ACS Tanks	2"-V-82	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	2"-V-76	тох	Check Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	1 1/2"-V-81	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	1-1/2"-V-77	тох	Check Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	LV-84	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	2"-V-78	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	LE-91	тох	Flange connection	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	LIT-93	тох	Flange connections w/ chemical seals	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	LE-95	тох	Flange connection w/ plug drain valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	PSE-162	тох	Rupture Disc w/ Flange connections	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	PSV-161	тох	Pressure Relief Valve	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS Tanks	2"-V-87	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	1-1/2"-V-85	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS Tanks	1-1/2"-V-86	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS Tanks	2"-V-81	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	2"-V-84	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	2"-V-79	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	LV-97	тох	Valve	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)
ACS Tanks	PDIT-099	тох	Flange connections w/ chemical seals	> 10%	Liquid	R315-8-18 (40 CFR 264 1058 and 1059)
ACS Tanks	SP-102	тох	Flange connections	> 10%	Liquid	R315-8-18 (40 CFR 264.1058 and 1059)

C: FACILITY IMPACT

Physical Facility Impacts

The new fully-tested froth collection assembly will be installed at each of the three MDMs. In addition, the Process computer code will be revised to incorporate the automatic operation of an electrical solenoid valve that provides actuation air to the ball valve within the agent suction line.

Administrative Facility Impacts

In accordance with the site Configuration Management Process for engineering changes, Plant procedures, training plans, drawings and miscellaneous documents will be revised to incorporate the new froth collection equipment.

Facility Personnel Impacts

Additional toxic entries by facility personnel will be required to install the froth collection equipment and perform various post-installation testing. Once fully installed and tested, it is anticipated that the operation of the MDM will not require more toxic entries than would have been required to support the previous MDM configuration. The automated operation of the new MDM pull and drain froth collection system will not require any additional operations personnel effort.

D: HEALTH/ENVIRONMENTAL IMPACT

There are no adverse health or environmental impacts associated with this modification, based on the following:

- 1) This modification will enable TOCDF to minimize agent contamination of plant equipment from the possibility of excessive frothing of Mustard.
- 2) This modification reduces the potential for agent contamination of Life Support System (LSS) hoses whenever toxic area entrant personnel are working in the vicinity.
- 3) This modification reduces airborne concentrations of Mustard vapor that may result from drippage or spillage.

E: JUSTIFICATION

CLASS 2 MODIFICATION TO RCRA PERMIT

In accordance with 40 CFR 270.42(d)(1), the Tooele Chemical Agent Disposal Facility (TOCDF) has requested a determination that this modification should be reviewed and approved as a Class 2 Modification Request.

As opposed to Class 1 and Class 3 modifications, Class 2 modifications apply to changes that are necessary to enable a permittee to respond in a timely manner to "common variation of wastes" and to "technological advancements". Class 1 modifications apply to minor changes that keep the permit current, whereas Class 3 modifications "substantially alter the facility or its operation".

Common Variations of Wastes

TOCDF has previously treated 105-mm and 155-mm projectiles at the MDMs. The existing design of the MDM does not have any provisions for capturing agent that may foam or otherwise be expelled up and out of the mortar when the agent cavity is opened up for draining. None of the projectiles previously treated on the TOCDF MDMs exhibited a tendency to froth or foam. Experience at JACADS revealed that some of the 4.2-inch Mustard mortars have experienced internal pressurization. This pressurization resulted in a frothing of the Mustard contents when the burster well press fit was initially loosened. TOCDF is preparing to treat the same types of Mustard mortars that were treated at JACADS.

Technological Advancements

The newly-designed MDM froth collection system has features that did not exist on the previous MDMs. The MDM froth collection system was designed based upon operating experience at JACADS with the Mustard-containing munitions.

Substantial Alteration of the Facility or Operation

The overall objective of the MDM remains the same, regardless of the addition of the froth collection feature. The modified MDM design will function as effectively with non-pressurized or non-frothing mortars.

1) The MDM pull and drain station will pump liquid agent from the mortar, agent drippage from the drip pans, and agent froth that may collect in the froth collection system.

- 2) The liquid agent within the mortar will be pumped to the Agent Quantification System (AQS) prior to transfer to the ACS tanks for ultimate destruction in the LIC primary chamber.
- 3) The liquid agent captured on the drip pans and within the froth collection system will be transferred directly to the ACS for destruction in the LIC primary chamber.

Because the installation of the froth collection system does not substantially alter the facility or its operation, this request does not meet the intent of a Class 3 modification.

Attachment 14, "Demilitarization Miscellaneous Treatment Units"

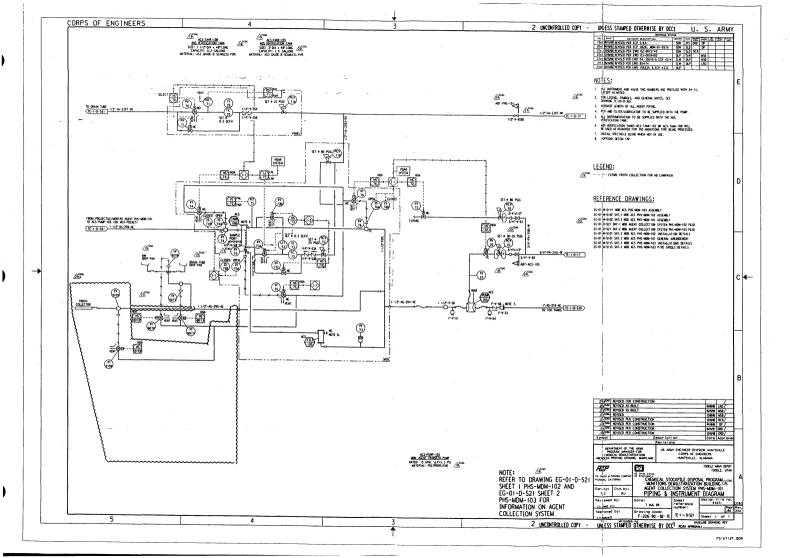
A one-sentence description of the froth collection feature has been added to the MDM's operation.

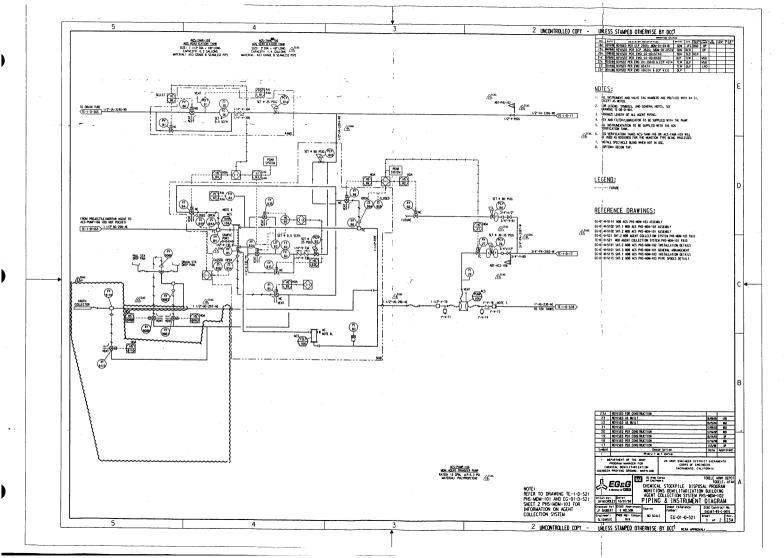
Attachment 17, "Equipment Lists"

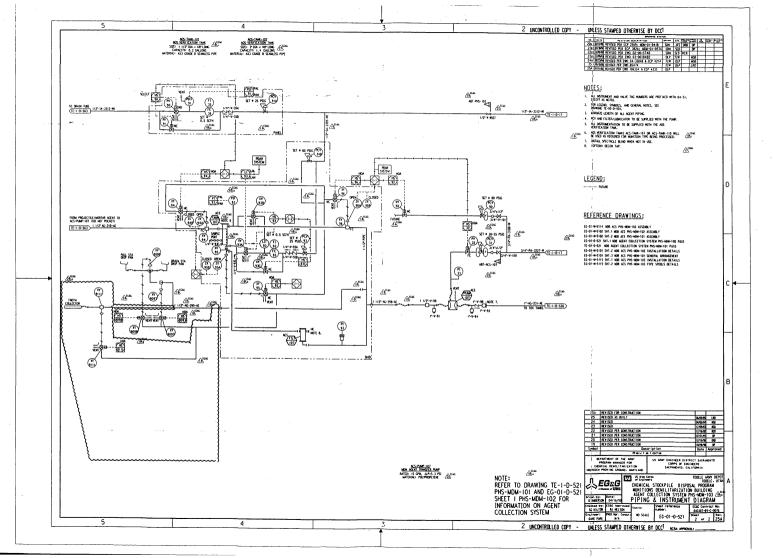
The froth collection system is designed to contain chemical agent, a hazardous waste with greater than 10% organic content. As such, the froth collection system is subject to the rules of 40 CFR 264 Subpart BB "Air Emissions Standards for Equipment Leaks". Attachment 17 of the RCRA permit contains a complete listing of ACS equipment subject to Subpart BB. In addition to the new froth collection system, equipment associated with the existing drip pans was also added to the equipment lists.

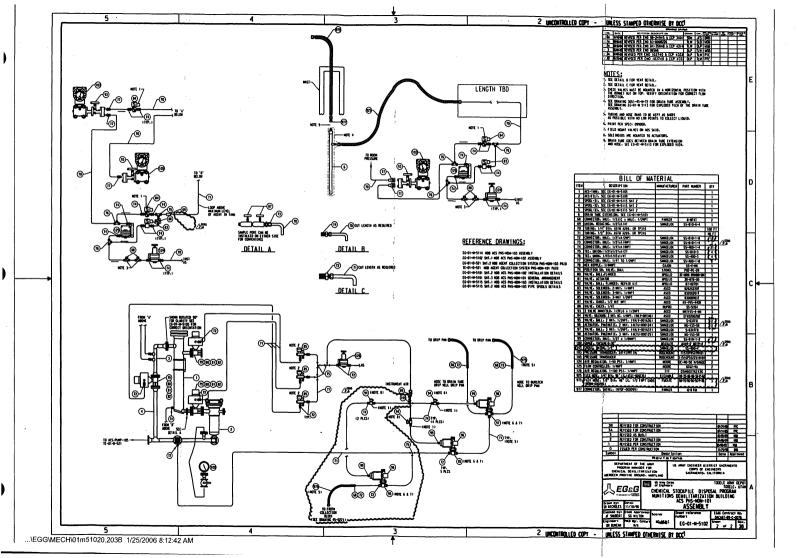
F: REFERENCE DRAWINGS

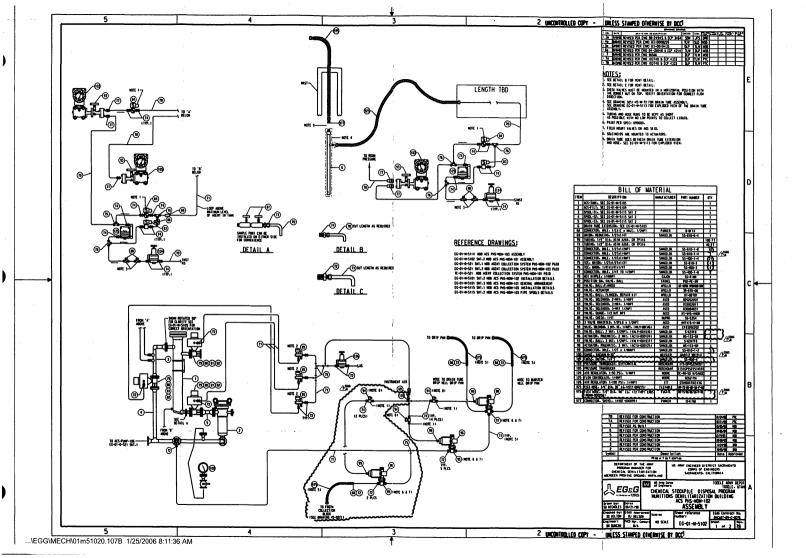
- EG&G Drawing TE-1-D-521 Sheet 1
 P&ID MDB Agent Collection PHS-MDM-101
- 2) EG&G Drawing EG-01-D-521 Sheet 1
 P&ID MDB Agent Collection PHS-MDM-102
- 3) EG&G Drawing EG-01-D-521 Sheet 2
 P&ID MDB Agent Collection PHS-MDM-103
- 4) EG&G Drawing EG-01-M-5102 Sheet 2 MDB ACS-PHS-MDM-101 Assembly
- 5) EG&G Drawing EG-01-M-5102 Sheet 1 MDB ACS-PHS-MDM-102 Assembly
- 6) EG&G Drawing EG-01-M-5114 Sheet 1 MDB ACS-PHS-MDM-103 Assembly
- 7) General Physics Corp. Drawing 45-0221 Sheet 1 Assembly Drawing – Froth Collection - MDM
- 8) General Physics Corp. Drawing 45-0287 Sheet 1
 Modified Stop Plate 4.2 Mortar Froth Collection System MDM Punch [sic]
 & Drain Station
- General Physics Corp. Drawing 45-0321 Sheet 1
 Froth Dam and Froth Cylinder Hanger MDM
- 10)General Physics Corp. Drawing 45-0329 Sheet 1 MDM Froth Shield for 4.2 Mortar
- 11)General Physics Corp. Drawing 45-0324 Sheet 1
 Frame Spacer for Froth Collection MDM Punch [sic] and Drain Station

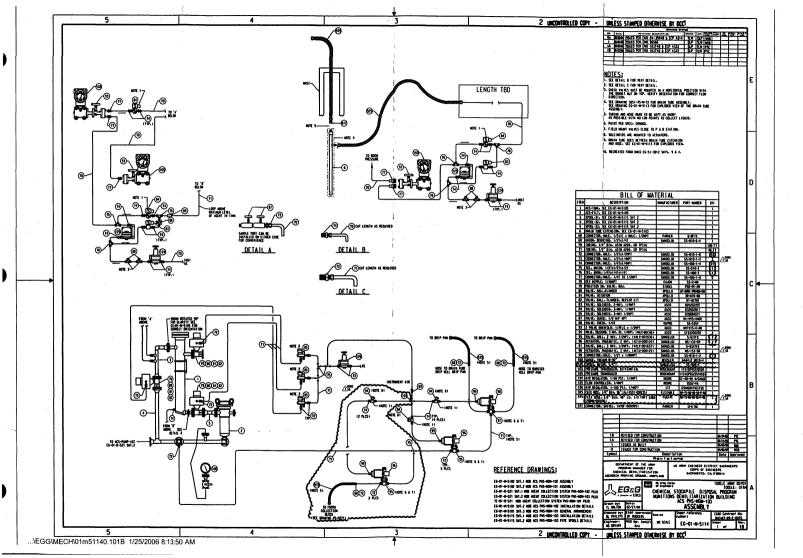


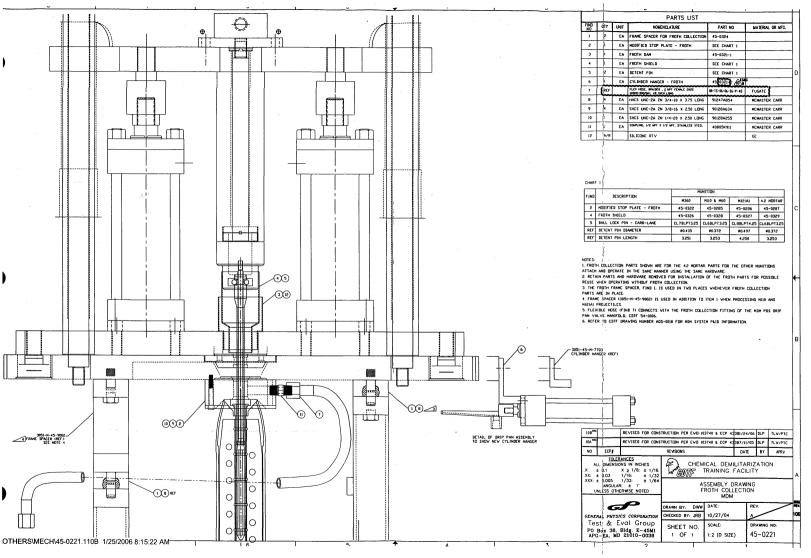


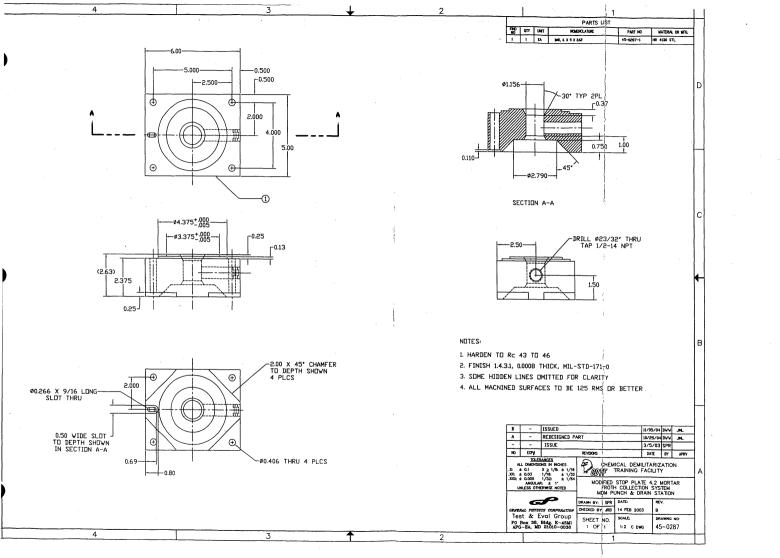


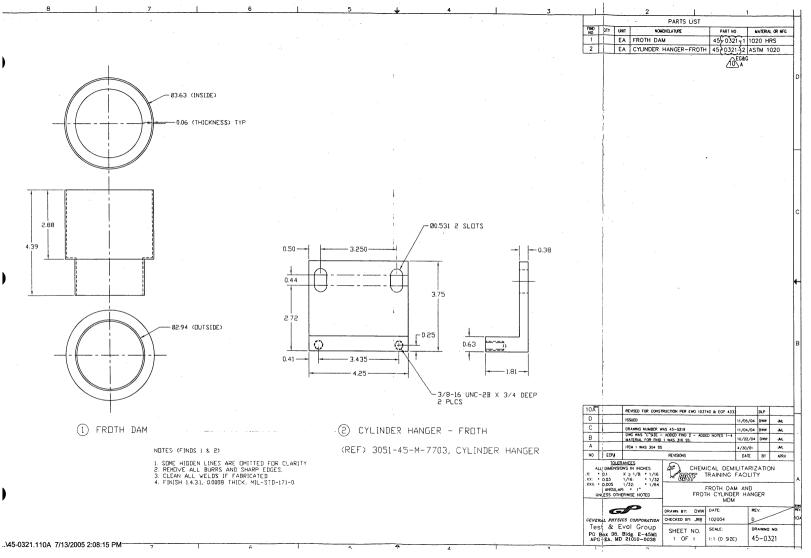


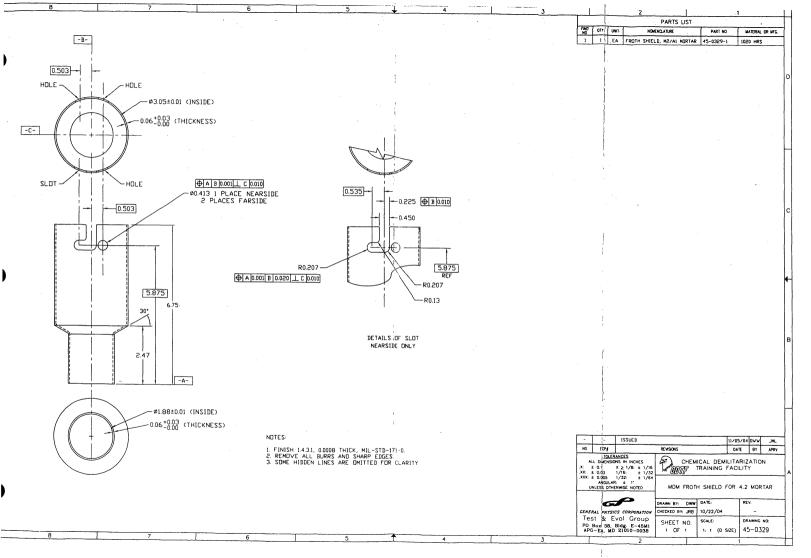


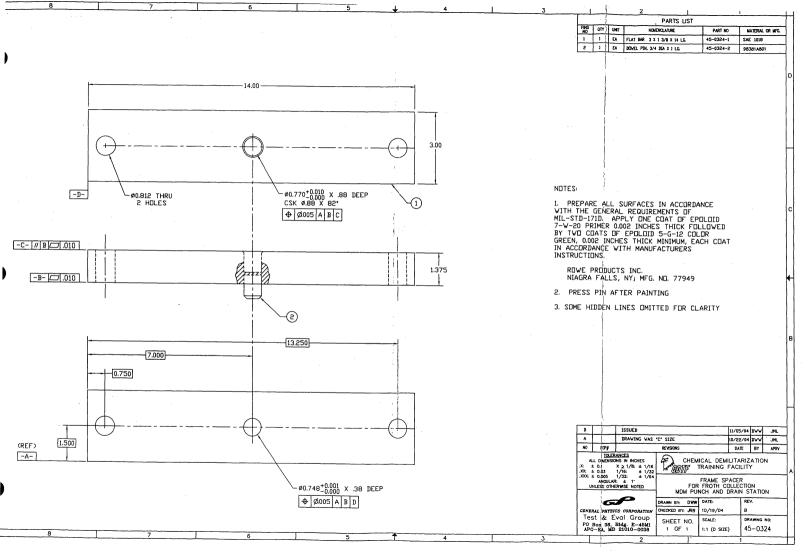












G: NOTICE TO MAILING LIST AND NEWSPAPER PUBLISHER

REQUEST NUMBER: TOCDF-MDM-02-0836

REQUEST TITLE: Froth Collection system for MDMs

SUMMARY: TOCDF has completed destruction of warfare munitions containing GB (Sarin) and VX. TOCDF is now in the process of modifying plant equipment for the processing of munitions containing the chemical warfare agents designated as H, HD and HT (collectively referred to as "Mustard" blister agent). The Mustard "campaign" is the third and final agent demilitarization campaign TOCDF is to undertake.

The Deseret Chemical Depot's chemical weapons stockpile contains approximately 63,500 4.2-inch mortars containing Mustard. Experience with Mustard-containing 4.2-inch mortars at the Johnston Atoll demilitarization site (JACADS) has shown that the liquid Mustard within the mortars may have experienced age-related internal pressurization. Mortars will be treated at TOCDF during the Non-Baseline Mustard campaign.

At JACADS many of the 4.2-inch mortars experienced "frothing" or foaming of their liquid contents when the agent cavity was breached. This resulted in some Mustard froth bubbling up and out of the mortars and onto the mortar body and surrounding machinery. In an effort to reduce the potential for agent contamination of TOCDF machinery and room surfaces, a "froth collection system" was designed to be installed on the Multipurpose Demilitarization Machines (MDMs) pull and drain station, where the 4.2-inch mortars will be processed. None of the munitions previously treated at the TOCDF MDMs exhibited a tendency to froth.

Concurrent with this modification request, TOCDF is requesting temporary authorization (TA) to begin installation and testing activities associated with the MDMs' 4.2-inch mortar froth collection systems prior to the end of the 60-day post-submittal period. The MDMs will not be used for hazardous waste treatment under the requested TA.